Case 1:00-cv-01881-CCC

Document 49 Louis G. Close, III,

ATTORNEY AT LAW

22 West Pennsylvania Avenue SUITE 300

TELEPHONE 410-296-3606 FACSIMILE 410-296-0080

Towson, Maryland 21204 E-MAIL: LGCIIIPA@aol.com

ADMITTED IN MARYLAND AND DISTRICT OF COLUMBIA

February 24, 2003

The Honorable Christopher C. Conner United States District Court for the Middle District of Pennsylvania U.S. District Courthouse 228 Walnut Street, P.O. Box 983 Harrisburg, Pennsylvania 17108

FILED HARRISBURG, PA

FEB 272003

MARY E. D'AND界样会 CLEF

Amanda Barge, et ux. v. David J. Salinger, M.D., et al.

United States District Court for the Middle District of Pennsylvania

Case No.: 1:00-CV-1881

Dear Judge Conner:

In reviewing Defendants' respective Pre-Trial Memoranda, I note that they include fact witnesses in Section 6, as well as expert witnesses. The Plaintiffs' Pre-Trial Memorandum addresses only expert witnesses.

Plaintiffs wish to reserve the right to call as witnesses at the trial of this case, in addition to the experts set forth in Plaintiffs' Pre-Trial Memorandum and identified earlier in accordance with the Court's Scheduling Order, the following:

- 1. The Plaintiffs;
- 2. The Defendants;
- Lisa Marie Barge (Plaintiffs' daughter) 3.
- 4. Michelle Lynn Barge (Plaintiffs' daughter)

Peggy Hawkins, Westminster Bank & Trust Company, Dept. of Human

Resources, 71 East Main Street, Westminster, Maryland 21168; and

Any and all witnesses (fact and/or expert) identified by any of the Defendants, whether called or not called as witnesses at the time of trial.

Please accept this letter as an amendment to Plaintiffs' Pre-Trial Memorandum previously submitted.

Very truly yours

LGC/dg

cc: Joseph A. Ricci, Esquire B. Craig Black, Esquire Richard Oare, Esquire